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Investments, LLC, SLA Investments, LLC,
and Negev Investments, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

SEATON INVESTMENTS, LLC, *et al.*,

Debtors and Debtors in
Possession.

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ
and 2:24-bk-12076-VZ

Chapter 11

- ☐ Affects All Debtors.
☐ Affects Seaton Investments, LLC (*Dismissed*)
☐ Affects Colyton Investments, LLC (*Dismissed*)
☐ Affects Broadway Avenue Investments, LLC
☒ Affects SLA Investments, LLC
☐ Affects Negev Investments, LLC
☐ Affects Alan Gomperts
☐ Affects Daniel Halevy
☐ Affects Susan Halevy

**STIPULATION BETWEEN SLA
INVESTMENTS, LLC AND
HARVEST SMALL BUSINESS
FINANCE, LLC TO AUTHORIZE
FINAL USE OF CASH
COLLATERAL PURSUANT TO 11
U.S.C. § 363(c)(2)**

Debtor SLA Investments, LLC (“SLA” or the “Debtor”) and Harvest Small Business Finance, LLC (“Harvest,” and together with SLA, the “Parties”), secured creditor in the above-entitled matter, by and through their respective counsel of record, hereby enter into this stipulation (“Stipulation”) concerning the Debtor’s use of Harvest’s cash collateral with respect to the real property located at 1040 South Los Angeles Street, Los Angeles, CA 90015 (the “Subject Property”).

Recitals

WHEREAS on June 7, 2024, debtors Seaton Investments, LLC, (“Seaton”), Colyton Investments, LLC (“Colyton”), SLA Investments, LLC (“SLA”), Negev Investments, LLC (“Negev”), Susan Halevy (“Susan” or “Susan Halevy”), and Alan Gomperts (“Alan” or “Alan Gomperts,”), the debtors and debtors-in-possession (the “Debtors”) in the above-entitled jointly administered chapter 11 bankruptcy cases filed their *Motion by Affected Debtors for Entry of an Order Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Motion”) (Dkt. No. 87);

WHEREAS, this Court entered an order (Dkt. No. 127) on the Motion on July 18, 2024, which granted interim relief for use of cash collateral as to debtors SLA, Negev, Susan Halevy, and Alan Gomperts, and which set forth terms and conditions of use of the cash collateral (the “Interim Cash Collateral Order”);

WHEREAS, the Parties have entered into several combined stipulations for continued use of cash collateral, which have required interim hearings and stipulations pursuant to which the Court most recently entered an order on May 5, 2025 (Dkt. No. 496) extending the interim use of cash collateral, “through May 6, 2025, or longer as the parties may determine;”

WHEREAS, the Parties have negotiated terms for the Debtor’s use of cash collateral on a final basis to avoid the unnecessary expense and time of continuing to enter into interim, continued use stipulations; and

WHEREAS, the Parties agree to final cash collateral use as to the Subject Property as set forth below, and they believe that it is in the best interests of the Parties and judicial economy to approve the following terms and conditions on a final basis.

STIPULATION

NOW, THEREFORE, IT IS STIPULATED AND AGREED, subject to court approval, as follows:

1. The foregoing recitals are hereby incorporated by reference.
2. The terms and conditions of the Interim Cash Collateral Order (Dkt. No. 127) are hereby incorporated by reference, as if fully stated herein.
1. The Parties stipulate and agree to authorization to use cash collateral as to the Subject Property *nunc pro tunc* from May 6, 2025 subject to the same terms and conditions stated in the Interim Cash Collateral Order on a final basis, including the Lender Rights and Protections, except as modified by the following terms:
 - a. SLA will make \$9,015 monthly adequate protection payments to Harvest (each an “Adequate Protection Payment”); and
 - b. The first such Adequate Protection Payment for May 2025 shall be made upon entry of an order approving this Stipulation;
 - c. Thereafter, beginning in June 2025, SLA will make monthly Adequate Protection Payments by the fifth day of each month until the SLA case is either dismissed, converted, or a plan of reorganization becomes effective; and
 - d. Harvest’s acceptance of payments is without prejudice to Harvest’s rights and remedies in SLA’s bankruptcy case, including without limitation the right to seek relief from the automatic stay, to seek dismissal or conversion of SLA’s bankruptcy case, and to object to confirmation of, or reject, any plan proposed in the bankruptcy case.
 - e. SLA shall not use Harvest’s cash collateral for any purpose except ordinary costs of repair, upkeep, maintenance, and insurance for the Subject Property, as those specific line items are set forth in the budget attached to the Motion, unless Harvest provides additional written consent; provided, however, that SLA may exceed the budgeted monthly amount for any expense line item by up to 15 percent without Harvest’s consent.

1 2. The Parties agree that as to the Parties, the Motion (Dkt. No. 87) shall be resolved
2 and any further appearances by the Parties at a related continued hearing should be waived.

3 IT IS SO STIPULATED.
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5 Dated: May 23, 2025

WEINTRAUB ZOLKIN TALERICO & SELTH LLP

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7 By: _____

8 Derrick Talerico
9 Attorneys for Debtors Broadway Avenue
10 Investments, LLC, SLA Investments, LLC, and Negev
 Investments, LLC

11 Dated: May 23, 2025

HEMAR, ROUSSO & HEALD, LLP

12
13 By:  _____

14 Christopher D. Crowell, attorneys for HARVEST
15 SMALL BUSINESS FINANCE, LLC
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
11766 Wilshire Blvd, Suite 730, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION BETWEEN SLA INVESTMENTS, LLC AND HARVEST SMALL BUSINESS FINANCE, LLC TO AUTHORIZE FINAL USE OF CASH COLLATERAL PURSUANT TO 11 U.S.C. SECTION 363(C)(2)**, will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) May 23, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached NEF Service List

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Pursuant to General Order 23-01, LBR 5005-2(d) continues to be temporarily suspended except for documents over 25 pages, including exhibits.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 23, 2025
Date

Martha E. Araki
Printed Name

/s/ Martha E. Araki
Signature

Seaton Investments, LLC – Jointly Administered

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Attorneys for Corporate Debtors Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC.: **Derrick Talerico:** dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com; admin@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Halevy, Susan Haley: **Zev Shechtman, Carol Chow, Turner Falk, Ryan Coy:** zev.shechtman@saul.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com; ryan.coy@saul.com
- Attorneys for Creditor First Foundation Bank: **Scott R Albrecht:** scott.albrecht@sgsattorneys.com; jackie.nguyen@sgsattorneys.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Garrick Vanderfin:** gvanderfin@polsinelli.com, ladocketing@polsinelli.com; zyoung@polsinelli.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Jacquelyn H Choi:** jacquelyn.choi@rimonlaw.com; docketingsupport@rimonlaw.com
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- Courtesy NEF/Interested Party: **Christopher Cramer:** secured@becket-lee.com
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Christopher Crowell:** ccrowell@hrhlaw.com
- Attorneys for Creditors Archway Real Estate Income Fund I SPE I, LLC, Archway Broadway Loan SPE, LLC, fka Archway Real Estate Income Fund I REIT, LLC, Archway Real Estate Income Fund, and Plaintiff Archway Broadway Loan SPE, LLC: **Michael G. Fletcher, Bruce D. Poltrock, Paige Selina Poupart, Gerrick Warrington:** mfletcher@frandzel.com; ppoupart@frandzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
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- Courtesy NEF/Interested Party Avi Muhtar: **Avi Edward Muhtar:** amuhtar@crownandstonelaw.com
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